## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO

SOPHIA PARKER STUDIOS, INC. (t/a WIFE NYC),

Plaintiff,

v.

ALICE TEMPERLEY MBE, TMLL LTD. (t/a TEMPERLEY LONDON), TEMPERLEY HOLDINGS LTD. (t/a TEMPERLEY HOLDINGS), ROMO LTD. (t/a ROMO and/or THE ROMO GROUP), ROMO (HOLDINGS) LTD., ROMO, INC. (t/a ROMO FABRICS AND WALLCOVERINGS and ROMO USA), THE ROMO GROUP LTD., AND DOES 1-20, inclusive.

Defendants.

Case No. 1:24-cv-02086-PAB

Judge Pamela A. Barker

Magistrate Judge Reuben J. Shepherd

PLAINTIFF SOPHIA PARKER STUDIOS, INC.'S MOTION FOR LEAVE TO FILE MEMORANDUM IN EXCESS OF LOCAL RULE PAGE LIMIT INSTANTER

Plaintiff Sophia Parker Studios, Inc. (t/a WIFE NYC) ("Plaintiff") respectfully moves the Court for leave to file *instanter* a 31-page Memorandum in Opposition to Defendant Alice Temperley's and Defendants TMLL Ltd. and Temperley (Holdings) Ltd.'s (collectively "Temperley London") Motion to Dismiss First Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(2) and (6). Plaintiff seeks leave of Court to file its Memorandum in Opposition, which exceeds the 20-page limit for memoranda related to dispositive motions in Local Rule 7.1(f), on the grounds that Defendants have filed an extensive Memorandum in Support of their Motion to Dismiss that includes many multi-pronged arguments

concerning personal jurisdiction and the legal sufficiency of the claims at issue in this action. Defendants' Motion to Dismiss raises many legal and factual issues that Plaintiff must address. Given the critical and dispositive nature of Defendants' Motion, Plaintiff believes it would be beneficial to the Court were Plaintiff permitted to provide thorough legal analysis on the many nuanced areas of copyright law implicated in the Motion as well as detailed facts in support of its Opposition, which requires exceeding the page limit.

Because of the serious nature of the relief sought by Alice Temperley and Temperley London and the multiple legal and factual issues at issue, Plaintiff submits that it is necessary and appropriate to exceed the 20-page limit for memoranda in support of dispositive motions set forth in Local Rule 7.1(f).

Plaintiff therefore respectfully requests leave of Court to file *instanter* its 31-page Memorandum in Opposition to Alice Temperley's and Temperley London's Motion to Dismiss First Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(2) and (6).

A proposed Order is attached for the Court's convenience.

Dated: June 27, 2025

/s/ Alyssa M. Bruno

By:

Alyssa M. Bruno (PA ID #321345; NJ ID #152382016) [Admitted to this Court]

A. BRUNO LAW

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